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June 23, 2023

Via Electronic Filing

Honorable Paul G. Gardephe
United States District Court
Southern District of New York
40 Foley Square, Room 2204
New York, New York 10007

Re: Techtronic Cordless GP v Maersk A/S
Case No. 1:23-cv-2739-PGG
Letter Motion for Extension of Answer Deadline for Defendant Maersk A/S
and Adjournment of Pretrial Conference

Dear Judge Gardephe,

Plaintiff Techtronic Cordless GP (hereinafter “Plaintiff”), by and through undersigned counsel, respectfully submits this letter motion pursuant to Section I.D. and I.E of this Honorable Court’s individual practices to request an extension of time for Defendant Maersk A/S (“Maersk”) to file an answer to the Summons and Complaint and to adjourn the Pretrial Conference in this matter. In support thereof, Plaintiff respectfully shows as follows:

Plaintiff’s Complaint was filed on March 31, 2023. Doc. 1. This Honorable Court issued a Notice of Pretrial Conference on April 7, 2023. Doc. 6. Plaintiff has completed service of process of the Summons and Complaint on Defendant Maersk A/S (hereinafter “Defendant”). Defendant is represented by attorney William J. Pallas of Freehill Hogan & Mahar LLP. Counsel for Plaintiff and Defendant have engaged in discussions to attempt to negotiate a pre-answer resolution of the matter, including the voluntary exchange of informal discovery and documentation. In pursuit of those good faith discussions, Plaintiff requests that this Honorable Court extend the time for Defendant Maersk to answer, move, or otherwise appear up to and including **August 18, 2023**.

In addition, the Parties respectfully request that the initial Pretrial Conference in this matter be adjourned from its present date of July 13, 2023 to September 7, 2023 or September 14, 2023,¹ consistent with the requested extension of the Answer date. Finally, the undersigned has recently

¹ Parenthetically, the parties are also available September 6, 8, and 13, but proposed the dates of September 7 and 14 consistent with this Court’s individual practices and preference for civil conferences to be held on Thursdays.



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been set for a Final Pretrial Conference and Evidentiary Hearing in an unrelated matter pending in the Superior Court of Washington, King County, No. 21-2-01457 before Hon. Hillary Madsen on July 14, 2023. While that hearing is via Zoom, the undersigned will need to be in Seattle, Washington on July 13, 2023 to prepare witnesses that may be called to testify during the hearing.

This is the first request for extension of time for Defendant to file a responsive pleading and to adjourn the Preliminary Conference. Respectfully, there are no current Court dates, appearances, or deadlines (other than those identified in this letter) which will be impacted by the requested extensions. The request is made not for the purposes of delay, but in good faith so that the parties may have additional time to attempt to resolve the pending dispute(s), either in whole or in part.

In advance, we thank the Court for its consideration of the requests.

MEMO ENDORSED: The application is granted. The conference currently scheduled for July 13, 2023 is adjourned to September 7, 2023 at 10:00 a.m.

Respectfully submitted,

Chalos & Co, P.C.

SO ORDERED.

Paul G. Gardephe
United States District Judge
Dated: June 26, 2023

Briton P. Sparkman

cc: **Via Email**

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